

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: : CHAPTER 13
:
Chong Woo Yi :
:
Debtor : BANKRUPTCY NO. 19-14866-mdc

**CHAPTER 13 STANDING TRUSTEE'S MOTION TO CONVERT CASE
TO CHAPTER 7 PURSUANT TO 11 U.S.C. SECTION 1307**

William C. Miller, Esquire, Chapter 13 standing trustee, files this Motion to Convert Case to Chapter 7 Pursuant to 11 U.S.C. Section 1307 and in support thereof represents as follows:

1. Debtor filed the above-captioned case on August 1, 2019.
2. The debtor has not ever made a payment to the Chapter 13 Trustee and is currently 5 months in arrears. Therefore, the Court has grounds to or convert the case under Section 1307 (c)(4).
3. Upon information and belief, the standing trustee avers that there may be non-exempt equity in debtor's property that could be recovered for the estate and creditors.
4. Rather than dismissal, the standing trustee believes that conversion of this case to Chapter 7 would be in the best interest of creditors.

WHEREFORE, William C. Miller, Esquire, Chapter 13 standing trustee, respectfully requests that an Order be entered converting this case to Chapter 7.

Respectfully submitted,

/s/ William C. Miller

Date: January 28, 2020

William C. Miller, Esquire
Chapter 13 Standing Trustee